PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Akron Foundry, Inc.
502 E. Main Street
Akron, Indiana 46910

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 049-5899-00001	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

TABLE OF CONTENTS

D.6 FACILITY OPERATION CONDITIONS - Core Making Operation

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.6.1 Particulate Matter (PM) [326 IAC 6-3-2]
D.6.2 Particulate Matter [326 IAC 2-2]

Compliance Determination Requirements
D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.7 FACILITY OPERATION CONDITIONS - Scrap and Charge Handling Operation

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.7.1 Particulate Matter (PM) [326 IAC 6-3-2]
D.7.2 Particulate Matter [326 IAC 2-2]

Compliance Determination Requirements
D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Certification Form

Quarterly Compliance Monitoring Form

Emergency/Deviation Occurrence Report

Quarterly Report Form

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary grey iron foundry.

Responsible Official:	David Ellenwood
Source Address:	502 E. Main Street, Akron, Indiana 46910
Mailing Address:	502 E. Main Street, Akron, Indiana 46910
SIC Code:	3370
County Location:	Fulton
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Two (2) electric induction furnaces, installed in 1997, capacity: 3.0 tons of metal per hour, each.

(b) One (1) pouring and cooling operation, capacity: 6.00 tons of metal per hour and 10.66 tons of sand molds and cores per hour.

(c) One (1) shakeout operation, capacity: 6.00 tons of metal per hour and 10.66 tons of sand molds and cores per hour.

(d) One (1) grinding and finishing operation consisting of six (6)stationary grinders, three (3) installed in 1965, one (1) installed in1970 and two (2) installed in 1983, capacity: 6.00 tons of metal total, one (1) shot-blaster, installed in 1985, capacity: 6.00 tons of metal per hour, one (1) rotary tumbler, installed in 1967, capacity: 6.00 tons of metal per hour and one (1) shared baghouse for particulate matter control, exhausting through stack S-2.

(e) One (1) sand handling operation consisting of one (1) muller installed in 1995, capacity: 21 tons of sand per hour, one (1) screenerator, installed in 1995, capacity: 21 tons of sand per hour, one (1) bucket elevator, installed in 1995, capacity: 21 tons of sand per hour, one (1) bucket loader, installed prior to 1995, capacity: 21 tons of sand per hour, wet sand conveyors, installed prior to 1995, capacity: 21 tons of sand per hour, one (1) sand and clay addition system, installed in 1995, capacity: 0.12 tons of sand and clay per hour and one (1) shared baghouse for particulate matter control, exhausting through stack S-2.

(f) One (1) core making operation consisting of three (3) manual shell machines, capacity: 100 pounds of sand per hour each and 6.00 tons per hour of metal.

(g) Manual molding machines, consisting of two (2) rotolifts, installed in 1984 and 1990, and eleven (11) portable floor squeezers, installed between 1950 and 1975, capacity: 10.66 tons of sand per hour, each.

(h) One (1) scrap and charge handling operation, capacity: 6.00 tons of iron per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air

Act;

(2) Any approval required by 326 IAC 2-1.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(i) A brief description of the change within the source;

(ii) The date on which the change will occur;

(iii) Any change in emissions; and

(iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAM, shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%), any one (1) six (6) minute averaging period as in determined 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is

present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

C.8 Production Limitation

The total metal melted and processed shall not exceed 10,000 tons per twelve (12) consecutive month period for the emission units specified in Section A.2 as (a) through (d) as well as (f) and (h) with conditions for these emission units specified in Sections D.1 through D.4 as well as D.6 and D.7. Compliance with this production limit will make 326 IAC 2-2 (Prevention of Significant Deterioration

(PSD)) not applicable.

C.9 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

Any change or modification which may increase potential to emit to 100 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented

within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.15 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable require-

ments. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) Two (2) electric induction furnaces, installed in 1997, capacity: 3.0 tons of metal per hour, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2][326 IAC 2-2]

(a) Pursuant to CP-049-7103-00001 issued on December 2, 1996 and 326 IAC 2-2, the particulate matter (PM) emissions from the two (2) induction furnaces shall not exceed 2.74 pounds per hour, each to avoid the applicability of 326 IAC 2-2.

(b) Pursuant to 326 IAC 6-3-2, allowable PM emissions shall not exceed 8.56 pounds per hour per furnace for a process weight rate of 3.0 tons per hour, each.

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(c) The PM_{10} emissions from the two (2) induction furnaces shall not exceed 3.20 pounds per hour, total to avoid the applicability of 326 IAC 2-2.

D.1.2 Production Limit

The total metal melted at this source shall not exceed 10,000 tons per twelve (12) consecutive month period. Compliance with this limit will make 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records the total metal melted at the source.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(b) One (1) pouring and cooling operation, capacity: 6.00 tons of metal per hour and 10.66 tons of sand molds and cores per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions from the pouring and cooling operation shall not exceed 27.0 pounds per hour for a process weight rate of 16.66 tons per hour.

(b) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Particulate Matter [326 IAC 2-2]

The particulate matter and PM_{10} emissions from the pouring and cooling operation shall not exceed 4.2 pounds per ton of metal poured and cooled, equivalent to 21.0 tons of PM and PM_{10} per year at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(c) One (1) shakeout operation, capacity: 6.00 tons of metal per hour and 10.66 tons of sand molds and cores per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions from the manual shakeout operation shall not exceed 27.0 pounds per hour for a process weight rate of 16.66 tons per hour.

(b) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.2 Particulate Matter [326 IAC 2-2]

(a) The particulate matter emissions from the shakeout operation shall not exceed 3.20 pounds per ton of metal shakeout, equivalent to 16.0 tons of PM per year at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

(b) The PM_{10} emissions from the shakeout operation shall not exceed 2.24 pounds per ton of metal shakeout, equivalent to 11.2 tons of PM_{10} per year at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(d) One (1) grinding and finishing operation consisting of six (6)stationary grinders, three (3) installed in 1965, one (1) installed in1970 and two (2) installed in 1983, capacity: 6.00 tons of metal total, one (1) shot-blaster, installed in 1985, capacity: 1.14 tons of metal per hour, one (1) rotary tumbler, installed in 1967, capacity: 6.00 tons of metal per hour and one (1) shared baghouse for particulate matter control, exhausting through stack S-2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions from the grinding and finishing operation shall not exceed a total of 13.6 pounds per hour for a total process weight rate of 6.0 tons per hour.

(b) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.2 Particulate Matter [326 IAC 2-2]

(a) The particulate matter emissions from the grinding and finishing operation shall not exceed 17.0 pounds per ton of metal ground and finished before control, equivalent to 2.55 tons of PM per year after control at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

(b) The PM_{10} emissions from the grinding and finishing operation shall not exceed 1.70 pounds per ton of ground and finished before control, equivalent to 0.255 tons of PM_{10} per year after control at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.5 Visible Emissions Notations

(a) Visible emission notations of the baghouse exhaust, Stack S-2 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the grinding and finishing operations, at least once daily when these operations are occurring and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 and 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.4.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the grinding and finishing operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.4.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.9 Record Keeping Requirements

(a) To document compliance with Condition D.4.5, the Permittee shall maintain records of visible emission notations of the grinding and finishing stack exhaust, S-2, once per shift.

(b) To document compliance with Condition D.4.6, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.4.7, the Permittee shall maintain records of the results of the inspections required under Condition D.4.7 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(e) One (1) sand handling operation consisting of one (1) muller installed in 1995, capacity: 21 tons of sand per hour, one (1) screenerator, installed in 1995, capacity: 21 tons of sand per hour, one (1) bucket elevator, installed in 1995, capacity: 21 tons of sand per hour, one (1) bucket loader, installed prior to 1995, capacity: 21 tons of sand per hour, wet sand conveyors, installed prior to 1995, capacity: 21 tons of sand per hour, one (1) sand and clay addition system, installed in 1995, capacity: 0.12 tons of sand and clay per hour and one (1) shared baghouse for particulate matter control, exhausting through stack S-2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions from the sand handling operations shall not exceed a total of 31.5 pounds per hour for a total process weight rate of 21.0 tons per hour.

(b) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.4 Visible Emissions Notations

(a) Visible emission notations of the baghouse exhaust, Stack S-2, shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting

startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.5.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the sand handling operations, at least once daily when sand handling operations are occurring and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 and 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.5.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the sand handling operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.5.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.8 Record Keeping Requirements

(a) To document compliance with Condition D.5.4, the Permittee shall maintain records of visible emission notations of the sand handling stack exhaust, S-2, once per shift.

(b) To document compliance with Condition D.5.5, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event .

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.5.6, the Permittee shall maintain records of the results of the inspections required under Condition D.5.6 and the dates the vents are re-directed.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(f) One (1) core making operation consisting of three (3) manual shell machines, capacity: 100 pounds of sand per hour each and 6.0 tons per hour of metal.

(g) Manual molding machines, consisting of two (2) rotolifts, installed in 1984 and 1990, and eleven (11) portable floor squeezers, installed between 1950 and 1975, capacity: 10.66 tons of sand per hour, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions from the core making operation shall not exceed 13.7 pounds per hour for a process weight rate of 6.05 tons per hour.

(b) The particulate matter (PM) emissions from the mold making operation shall not exceed 20.0 pounds per hour for a process weight rate of 10.66 tons per hour.

(c) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.6.2 Particulate Matter [326 IAC 2-2]

The particulate matter and PM_{10} emissions from the core making operation shall not exceed 1.10 pounds per ton of metal produced, equivalent to 5.50 tons of PM and PM_{10} per year at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

Compliance Determination Requirements

D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(h) One (1) scrap and charge handling operation, capacity: 6.0 tons of iron per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions from the scrap and charge handling operation shall not exceed 13.6 pounds per hour for a process weight rate of 6.0 tons per hour.

(b) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.7.2 Particulate Matter [326 IAC 2-2]

The particulate matter and PM_{10} emissions from the scrap and charge handling operation shall not exceed 0.60 pounds per ton of metal charged, equivalent to 3.0 tons of PM and PM_{10} per year at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

Compliance Determination Requirements

D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Akron Foundry, Inc.
Source Address: 502 E. Main Street, Akron, Indiana 46910
Mailing Address: 502 E. Main Street Akron, Indiana 46910
Part 70 Permit No.: T 049-5899-00001

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Akron Foundry, Inc.
Source Address: 502 E. Main Street, Akron, Indiana 46910
Mailing Address: 502 E. Main Street, Akron, Indiana 46910
Part 70 Permit No.: T 049-5899-00001

Months:_____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of Each Deviation**

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Akron Foundry, Inc.
Source Address: 502 E. Main Street, Akron, Indiana 46910
Mailing Address: 502 E. Main Street, Akron, Indiana 46910
Part 70 Permit No.: T 049-5899-00001

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Akron Foundry, Inc..
Source Address: 502 Main Street Akron, Indiana 46910
Mailing Address: 502 Main Street Akron, Indiana 46910
Part 70 Permit No.: T 049-5899-00001
Facility: Two (2) Induction Furnaces
Parameter: Total metal melted
Limit: 10,000 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: **Akron Foundry, Inc.**
Source Location: **502 E. Main Street, Akron, Indiana 46910**
County: **Fulton**
Part 70 Operating Permit: **OP T 049-5899-00001**
SIC Code: **3370**
Permit Reviewer: **Frank P. Castelli**

On December 4, 1997, the Office of Air Management (OAM) had a notice published in the Rochester Sentinel, Rochester, Indiana, stating that Akron Foundry, Inc. had applied for a Part 70 Operating Permit to operate a grey iron foundry. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

1. Section A (Source Summary) has been changed as follows:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), ~~and presented in the permit application.~~ **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

2. The equipment list in Section A.2 (d) and Section D.4 has been modified based upon the inspector's site inspection. In addition, the installation dates have been added as follows:

(d) One (1) grinding and finishing operation consisting of **six (6)** ~~four (4)~~ stationary grinders, **three (3) installed in 1965, one (1) installed in 1970 and two (2) installed in 1983, capacity: 6.0 tons of metal total,** one (1) shot-blaster, **installed in 1985, capacity: 6.0 tons of metal per hour**, **one (1) rotary tumbler, installed in 1967, capacity: 6.0 tons of metal per hour** and one (1) shared baghouse for particulate matter control, exhausting through stack S-2. ~~capacity: 2.5 tons of iron per hour, total~~.

3. Condition A.5 (Prior Permit Conditions Superceded) has been deleted. Language has been added to Condition B.14 (Permit Shield) to address the effect of prior permit conditions.

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~
~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of~~

~~issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

SECTION B GENERAL CONDITIONS

4. Condition B.1 (Permit No Defense) part (b) of the condition has been changed as follows:

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

5. Condition B.8 (Duty to Supplement and Provide Information) part (c) of the condition has been changed as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** ~~For information claimed to be confidential~~, the Permittee **must** ~~shall~~ furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, **to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records,** then the Permittee **must** ~~shall~~ furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

6. Condition B.9 (Compliance with Permit Conditions) has been modified to show that conditions that are not federally enforceable may not constitute a violation of the Clean Air Act.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, **except those specifically designated as not federally enforceable**, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

7. Condition B.10 (Certification) has been revised since there are currently no certifications that would not be required to be certified by the Responsible Official.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**[326 IAC 2-7-5(3)(C)]**

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit,~~ shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

8. Condition B.11 (Annual Compliance Certification) part (c) has been changed to the following:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was **based on** continuous or intermittent **data**;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

9. Condition B.12 (Preventive Maintenance Plan) has been changed as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within **ninety (90) days** after issuance of this permit, including the following information on each **facility**:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement the Preventive Maintenance Plan** does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. **IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.**

10. Condition B.14 (Permit Shield) has been changed as follows:

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

~~(a)~~ **(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided **that** ~~either of the following:~~

(1) The applicable requirements are included and specifically identified in this permit; **or**

(2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**

~~(b)~~ **(c)** ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.~~ **If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.**

~~(c)~~ **(d)** ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~ **No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**

~~(d)~~ **(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

~~(e)~~ **(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

~~(f)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

11. Condition B.16 (Deviations from Permit Requirements and Conditions) has been changed as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1 (34).**

~~(c)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

12. Condition B.18 (Permit Renewal) part (a) has been changed as follows:

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

13. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into a new Condition B.19 (Permit Amendment or Modification) as follows. Conditions B.20 and B.21 have been deleted and the remainder of Section B has been renumbered. The new B.19 condition reads as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

14. Condition B.21 (Changes Under Section 502(b)(10) of the Clean Air Act) has been deleted and Condition B.20(b) (Operational Flexibility) has been revised as follows. Both conditions refer to the same rule and they have been combined as follows:

~~B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]~~

~~The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:~~

~~(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.~~

~~(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~

B.21 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC ~~2-1~~ **2-1.1** has been obtained;

~~(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

~~(1)~~**(i)**A brief description of the change within the source;

~~(2)~~**(ii)**The date on which the change will occur;

~~(3)~~**(iii)** Any change in emissions; and

~~(4)~~**(iv)** Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

15. Condition B.23 (now Condition B.22) (Construction Permit Requirement), the referenced statute has been repealed therefore this condition has been revised as follows:

B.23 Construction Permit Requirement [326 IAC 2]

~~Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997,~~ **A** modification, construction, or reconstruction shall be approved ~~as~~ **if** required by and in accordance with **the applicable provisions of** 326 IAC 2.

16. Condition B.26 (now B.23) (Inspection and Entry) in order to clarify confidentiality Condition B.26 has been revised. OAM also determined that subpart (1) and (2) of paragraph (e) were unnecessary, therefore they have been deleted.

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such,** the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

17. Condition B.27 (now B.24) (Transfer of Ownership or Operation) part (b) has been changed as follows:

B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

18. Condition B.28 (now B.25) (Annual Fee Payment) has been changed as follows:

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing~~. or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.**

(b) ~~Failure~~ **Except as provided in 326 IAC 2-7-19(e), failure** to pay may result in administrative enforcement action or revocation of this permit.

(c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

SECTION C SOURCE OPERATION CONDITIONS

19. Condition C.1 has been deleted..

~~C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]~~

~~While this source is one of the twenty eight (28) PSD major source categories the total source potential emissions of particulate matter, after control, are less than 100 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~

20. Condition C.1 (Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour) has been added.

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

21. Condition C.2 has been updated to reflect the revision in 326 IAC 5-1-2 dated November 1, 1998. as follows:

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ opacity shall meet the following, unless otherwise stated in this permit:

(a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor)** in a six (6) hour period.

22. Condition C.4 (Incineration) has been revised to state that 326 IAC 9-1-2 is not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. **The provisions of 326 IAC 9-1-2 are not federally enforceable.**

23. Condition C.6 (Operation of Equipment) has been changed as follows:

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, ~~A~~all air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

24. Condition C.7 (Asbestos Abatement Projects- Accreditation) and Condition C.13 (Asbestos Abatement Projects) have been combined into one condition as follows:

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

25. Condition C.8 (Performance Testing) (now C.10) has had the rule cite changed to 326 IAC 3-6 and the following language has been added:

C.8 Performance Testing ~~[326 IAC 3-2.1]~~ **[326 IAC 3-6]**

(a) All testing shall be performed according to the provisions of 326 IAC ~~3-2.1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing ~~methods~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the ~~Commissioner~~ IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

26. Condition C.9 (Compliance Schedule) (now C.11) has been changed as follows:

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

27. Condition C.10 (Compliance Monitoring) (now C.12) has been changed as follows:

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. **All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.** The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment ~~no more than ***ninety (90) days*** after receipt of this permit~~. If due to circumstances beyond its control, ~~this schedule cannot be met~~ **that equipment cannot be installed and operated within ninety (90) days**, the Permittee **may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee** notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule ~~no more than ninety (90) days~~** ~~after receipt of this permit~~, with full justification of the reasons for the inability to meet this date. ~~and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

28. Condition C.12 (Monitoring Methods) (now C.14) has been changed as follows:

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing **required by Section D** ~~performed to meet the requirements~~ of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

29. Condition C.13 (Asbestos Abatement Projects) has been deleted and has been incorporated into the revised Condition C.7 (Asbestos Abatement Projects).

~~C.13 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]~~

~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos-containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~

~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~

~~(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or~~

~~(2) If there is a change in the following:~~

~~(A) Asbestos removal or demolition start date;~~

~~(B) Removal or demolition contractor; or~~

~~(3) Waste disposal site.~~

~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~

~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

~~All required notifications shall be submitted to:~~

~~Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~(e) Procedures for Asbestos Emission Control~~
~~The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

~~(f) Indiana Accredited Asbestos Inspector~~
~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.~~

30. A new Condition C.15 has been added as follows.

C.15 **Pressure Gauge Specifications**

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

31. Condition C.14 (Emergency Reduction Plans) (now C.16) has been changed as follows:

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

32. Condition C.15 (Risk Management Plan) (now C.17) has been changed as follows:

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

33. Condition C.16 (Compliance Monitoring Plan - Failure to Take Response Steps) (now C.18) has had the following rule cites added:

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5~~(3)~~]**[326 IAC 2-7-6] [326 IAC 1-6]**

34. Condition C.17 (Actions Related to Noncompliance Demonstrated by a Stack Test), (now C.19) has had the rule cites added to the title and following language added after part (b):

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5] [326 IAC 2-7-6]**

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

35. Condition C.18 (Emission Statement) (now C.20(a)) has been changed as follows:

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit a**n** ~~certified,~~ annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

36. Condition C.20 (General Record Keeping Requirements) (now C.22) has been changed as follows (c)(4) has been modified to match Condition B.12:

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)~~(B)~~] **[326 IAC 2-7-6]**

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM, representative~~, for a minimum of three (3) years~~. ~~They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request.~~ **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that ~~improper maintenance~~ **failure to implement the Preventive Maintenance Plan** did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

37. Condition C.21 (General Reporting Requirements) (now C.23) has changed to the following:

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

~~(a)~~**(b) The report required in (a) of this condition and** reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

~~(b)~~(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other

means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

~~(c)~~(d) Unless otherwise specified in this permit, any ~~quarterly~~ semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.

~~(d)~~(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

~~(e)~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

~~(f)~~g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D FACILITY OPERATION CONDITIONS

38. Section D (Facility Operation Conditions) has had the following language added to the facility description box in all Section Ds

Facility Description [326 IAC 2-7-5(15)] **(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

39. Conditions D.1.3, D.2.3, D.3.3, D.4.4, D.5.4, D.6.3 and D.7.3 (Testing Requirements) have been changed as follows.

Testing Requirements [326 IAC 2-7-6(1),**(6)**]

~~Testing of~~ **The Permittee is not required to test** this facility **(these facilities)** ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing at**

any specific time when necessary to determine if the facility is (facilities are) in compliance. If testing is required **by IDEM**, compliance with the **particulate matter** limit specified in Conditions (D.1.1, D.2.1, D.3.1, D.4.1, D.5.1, D.6.1 or D.7.1) shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

40. Conditions D.4.4 (now D.4.5) and D.5.4 (Visible Emission Notations) have been changed as follows.

D.4.4 Visible Emissions Notations

(a) ~~Daily~~ **V**~~v~~isible emission notations of the baghouse exhaust ~~listed in Section D.4~~ **Stack S-2** shall be performed **once per shift** during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

D.5.4 Visible Emissions Notations

(a) ~~Daily~~ **V**~~v~~isible emission notations of the baghouse exhaust ~~listed in Section D.5~~ **Stack S-2** shall be performed **once per shift** during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

41. Conditions D.4.7 and D.5.6 have been added as follows:

D.4.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the grinding and finishing operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.5.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the sand handling operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

42. Conditions D.4.6 (now D.4.8)and D.5.6 (now D.5.7) (Broken Bag or Failure Detection) have been changed as follows.

D.4.6 and D.5.7 Broken **or Failed** Bag ~~or Failure~~ Detection

In the event that bag failure has been observed.

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B -**

Emergency Provisions).

(b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

43. Conditions D.4.7 (now D.4.9) and D.5.7 (now D.5.8) have been revised as follows to account for the addition of the baghouse inspections and to properly cite the record keeping requirements of the parametric baghouse monitoring.

D.4.7 Record Keeping Requirements

~~To document compliance with Conditions D.4.4 and D.4.5, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust and at least once daily notations of the total static pressure drop across the baghouse when venting to the atmosphere.~~

(a) To document compliance with Condition D.4.5, the Permittee shall maintain records of visible emission notations of the grinding and finishing stack exhaust, S-2, once per shift.

(b) To document compliance with Condition D.4.6, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(b) To document compliance with Condition D.4.7, the Permittee shall maintain records of the results of the inspections required under Condition D.4.7 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.7 Record Keeping Requirements

~~To document compliance with Conditions D.4.4 and D.4.5, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust and at least once daily notations of the total static pressure drop across the baghouse when venting to the atmosphere.~~

(a) To document compliance with Condition D.5.4, the Permittee shall maintain records of visible emission notations of the sand handling stack exhaust, S-2, once per shift.

(b) To document compliance with Condition D.5.5, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.5.6, the Permittee shall maintain records of the results of the inspections required under Condition D.5.6 and the dates the vents are redirected.

(d) All records shall be maintained in accordansce with Section C - General Record Keeping Requirements, of this permit.

44. The potential VOC emissions from the dip tank have been calculated to verify that it is an insignificant activity. The calculations are as follows using the “Black Water Reducible Enamel” coating with a density of 10.69 pounds per gallon, a VOC content of 2.9 pounds per gallon (27.1 percent) and

an annual usage of 800 gallons for 260 days and 1,560 hours per year of operation. The 1,560 hours per year of operation is the minimum hours of operation per year which results in the worst case (maximum) gallons per hour of coating usage.

(a) Daily Emissions = 800 gal/260 days = 3.08 gal/day X 10.69 pounds/gallon = 32.9 pounds /day. 32.9 pounds/day X 0.271 VOC content = 8.9 pounds/day VOC which is less than the insignificant activity threshold of 15 pounds/day.

(b) Hourly Emissions = 800 gal/1,560 hours = 0.513 gal/hour X 10.69 pounds/gallon = 5.48 pounds /hour. 5.48 pounds/hour X 0.271 VOC content = 1.49 pounds/hour VOC which is less than the insignificant activity threshold of 3.0 pounds/hour.

Therefore the dip coating operation is an insignificant activity and is also not subject to the VOC content requirements of 326 IAC 8-2-9 because the potential VOC emissions are less than 15 pounds per day.

Forms

45. In the Certification Form, the words “Emergency/Deviation Occurrence Reporting Form” have been deleted as shown in form as follows.

46. The Emergency/Deviation Occurrence Reporting Form has had the rule cite 326 IAC 2-7-5(3)(c) should have been a capital C, 326 IAC 2-7-5(3)(C) and the phrase “Attach a signed certification to complete this report” deleted from the bottom of the second page. The changes are shown in the following pages.

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)~~(c)~~**(C)** C The Permittee must submit notice in writing within ten (**10**) calendar days

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Akron Foundry, Inc.
Source Address: 502 E. Main Street, Akron, Indiana 46910
Mailing Address: 502 E. Main Street, Akron, Indiana 46910
Part 70 Permit No.: T 049-5899-00001

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

~~**9** Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

~~Attach a signed certification to complete this report.~~

On January 7, 1998 and November 10, 1998 as well as on March 16, 1999, David Ellenwood, President of Akron Foundry, Inc., submitted comments on the proposed Part 70 Operating Permit. The comments are as follows:

Comment 1:

Areas of Concern
The town of Akron changed all addresses. The draft has 501 Main St. Correct address is 502 E. Main St.

Response 1:

The address has been revised on all appropriate sections of the permit.

Comment 2:

You have broken our shop down into 7 areas as emission units, page 1 of 16, TSD.

You have (f) as 12.5 tons sand per hour. 100 lbs per hour is correct.

Response 2:

Part (f) of Section A.2 of the permit has been revised to indicate 100 pounds per hour as the capacity of the sand in the core making operation plus the 6.0 tons per hour of metal. Section D.6 of the permit has also been revised as required. The revised permit sections are as follows:

Section A.2 and Section D.6(f)

(f) One (1) core making operation **consisting of three (3) manual shell machines**, capacity: **100 pounds** ~~12.5 tons~~ of ~~sand~~ **sand** per hour **each and 6.0 tons per hour of metal**.

As a consequence of this reduction in the process weight rate the allowable PM emissions in Condition D.6.1(a) have been reduced from 22.3 pounds per hour to 13.7 pounds per hour.

Comment 3:

You have based everything on the assumption of maximum 6 tons of iron an hour production. Furnaces are 3 ton an hour with 1 furnace, you have determined that since we have 2 furnaces, we might change a wire and run two furnaces. It would be a major change to achieve this. (See Inductotherm Corporation, Rancocus, NJ.) However it wouldn't matter even if we had a 40 ton an hour furnace. Our production and emission potential is limited by our type of production equipment and physical size of our building. It would be impossible to exceed 19% of the amount you calculate. Based on our physical limitations and figuring 7 days a week, 50 weeks a year, our greatest potential for production is 10,000 tons a year. Even this is not attainable. Just look at the quarterly reports we had to submit as part of our last Air Permit. It was less than 40% of this 10,000 ton amount. This correct and realistic approach suggests that our Potential Emissions are 81% less than your calculations (page 4 of 5 TSD). Correct calculations would put our after control PM at 55 tons/year - PM_{10} at 40 tons/year and VOC at .004 tons/year. I believe we should be a Minor source PSD, not a Major source PSD. I believe we had been considered a major source in past years due to the same faulty calculations. The prior process may have also had a bearing on this. Note sand handling process weight rate should be 10.66 tons per hour rather than 48.9 tons per hour.

On March 16, the source subsequently stated that Akron Foundry is willing to limit production to 10,000 tons of metal per twelve (12) consecutive month period.

Response 3:

The total capacity of the two (2) induction furnaces has been retained as 6.0 tons per hour. A production limit of 10,000 tons of metal per year has been added to insure that this source is classified as a minor PSD source. The emission calculations on pages 1 - 4 of 5 of Appendix A to the TSD have been revised and are attached. **Section A.1 has been updated to reflect the fact that the source in now considered an existing minor PSD source because potential PM emissions after control and the production limit are less than one hundred (100) tons per year since Akron is one of the 28 major PSD sources.** Conditions C.8 (Production Limitation) and Condition C.9 (Prevention of Significant Deterioration (PSD)) have been added to reflect the overall source limit to avoid the applicability of 326 IAC 2-2. Sections A.2 and D.2, D.3, D.4, D.5, D.6 and D.7 of the permit have been revised as shown. In addition, Conditions D.1.1, D.2.1, D.3.1, D.4.1, D.5.1, D.6.1 and D.7.1 have been revised to clarify the emission rate limits and to reflect the changes in the process weight rates.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(b) One (1) pouring and cooling operation, capacity: 6.0 tons of ~~iron~~ **metal** per hour **and 10.66 tons of sand molds and cores per hour**.

(c) One (1) shakeout operation, capacity: 6.0 tons of **iron metal** per hour **and 10.66 tons of sand molds and cores per hour**.

(e) One (1) sand handling operation consisting of one (1) muller **installed in 1995, capacity: 21 tons of sand per hour**, one (1) screenerator, **installed in 1995, capacity: 21 tons of sand per hour,** one (1) bucket elevator**, installed in 1995, capacity: 21 tons of sand per hour**, one (1) bucket loader, **installed prior to 1995, capacity: 21 tons of sand per hour,** wet sand conveyors, **installed prior to 1995, capacity: 21 tons of sand per hour,** one (1) sand and clay addition system, **installed in 1995, capacity: 0.12 tons of sand and clay per hour** and one (1) shared baghouse for particulate matter control, exhausting through stack S-2 ~~capacity: 48.9 tons of sand per hour, total~~.

(f) One (1) core making operation **consisting of three (3) manual shell machines**, capacity: **100 pounds** ~~12.5 tons~~ of sand per hour **each and 6.0 tons per hour of metal**.

(g) Manual molding machines, consisting of two (2) rotolifts, installed in 1984 and 1990, and eleven (11) portable floor squeezers, installed between 1950 and 1975, capacity: 10.66 tons of sand per hour, each.

~~(g)~~**(h)** One (1) scrap and charge handling operation, capacity: 6.0 tons of iron per hour.

C.8 Production Limitation

The total metal melted and processed shall not exceed 10,000 tons per twelve (12) consecutive month period for the emission units specified in Section A.2 as (a) through (d) as well as (f) and (h) with conditions for these emission units specified

in Sections D.1 through D.4 as well as D.6 and D.7. Compliance with this production limit will make 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

C.9 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

Any change or modification which may increase potential to emit to 100 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2] **[326 IAC 2-2]**

(a) Pursuant to CP-049-7103-00001 issued on December 2, 1996 **and 326 IAC 2-2**, the particulate matter (PM) emissions from the two (2) induction furnaces shall not exceed **2.74** ~~5.50~~ pounds per hour, **each** ~~total~~.

(b) Pursuant to 326 IAC 6-3-2, allowable PM emissions shall not exceed 8.56 pounds per hour per furnace for a process weight rate of 3.0 tons per hour, each.

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(**c**~~b~~) The PM_{10} emissions from the two (2) induction furnaces shall not exceed 3.20 pounds per hour, total **to avoid the applicability of 326 IAC 2-2.**

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions from the pouring and cooling operation shall not exceed **27.0** ~~34.5~~ pounds per hour for a process weight rate of **16.66** ~~24.0~~ tons per hour.

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions from the manual shakeout operation shall not exceed **27.0** ~~34.5~~ pounds per hour for a process weight rate of **16.66** ~~24.0~~ tons per hour.

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions from the grinding and finishing operation shall not exceed **a total of 13.6** ~~7.58~~ pounds per hour for a **total** process weight rate of **6.0** ~~2.5~~ tons per hour.

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions from the sand handling operations shall not exceed **31.5** ~~44.4~~ pounds per hour for a process weight rate of **21.0** ~~48.9~~ tons per hour.

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions from the core making operation shall not exceed **13.7** ~~22.3~~ pounds per hour for a process weight rate of **6.05** ~~12.5~~ tons per hour.

(b) The particulate matter (PM) emissions from the mold making operation shall not exceed 20.0 pounds per hour for a process weight rate of 10.66 tons per hour.

D.7.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions from the scrap and charge handling operation shall not exceed **13.6** ~~2.81~~ pounds per hour for a process weight rate of **6.0** ~~0.570~~ tons per hour.

Due to these process weight rate changes in the emission calculations shown in the attached revised spreadsheet on pages 1 through 5 of 5, the limited potential to emit table of the TSD has been revised as follows:

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Induction melting furnaces	**4.50**	**4.30**	0.00	0.00	0.00	0.00	**0.287**
Pouring and cooling operation	**21.0**	**21.0**	0.00	**5.02**	0.00	0.00	**0.308**
Shakeout operation	**16.0**	**11.2**	0.00	0.00	0.00	0.00	0.00
Grinding and finishing operation	**2.55**	**0.255**	0.00	0.00	0.00	0.00	0.00
Sand handling operation	**9.93**	**9.93**	0.00	0.00	0.00	0.00	0.00
Core making operation	**5.50**	**5.50**	0.00	**0.004**	0.00	0.00	**0.452**
Scrap and charge handling	**3.00**	**3.00**	0.00	0.00	0.00	0.00	0.00
Insignificant activities	5.00	5.00	1.00	3.0	1.00	2.00	2.00
Total Emissions	**67.5**	**60.2**	1.00	**8.02**	1.00	2.00	**3.05**

(a) The values in the table are the potential emissions after controls and the 10,000 TPY melt limit.

(b) See pages 1 through 6 of 6 of Appendix A for detailed calculations.

The PM allowable table in the TSD has also been revised as follows:

The PM limits for each operation are as follows:

Operation	Process Weight (tons per hour)	Allowable PM Emission Rate (pounds per hour)	Potential PM Emission Rate After Controls (pounds per hour)
Scrap & charge handling	**6.0**	**13.6**	**3.60**
Two (2) electric induction melting furnaces	6.0, total	**2.74, each**	**2.70, each**
Pouring & cooling	**16.7** (sand & molds)	**27.0**	**25.2**
Shakeout	**16.7** (sand & molds)	**27.0**	**19.2**
Grinding and finishing	**6.0**	**13.6**	**3.06**
Sand handling	**21.0**	**31.5**	**1.15**
Core making	**6.05** (sand & molds)	**13.7**	**6.60**

The allowable PM emissions for the two (2) furnaces are pursuant to Registration CP 049-7103 issued December 2, 1996 which limited the allowable PM emissions to less than 25 tons per year for registration status.

As shown in the above table all operations comply with the requirements of this rule. The grinding and finishing operations and the sand handling operations require the operation of the baghouse control device in order to comply with 326 IAC 6-3-2.

Condition D.1.2 has been added to limit production to 10,000 tons of metal melted from the two (2) electric induction furnaces per twelve (12) consecutive month period to avoid being a major PSD source. Conditions D.1.4 and D.1.5 have been added to require record keeping and reporting of same.

D.1.2 Production Limit

The total metal melted at this source shall not exceed 10,000 tons per twelve (12) consecutive month period. Compliance with this limit will make 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records the total metal melted at the source.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

The following conditions have been added as Conditions D.2.2, D.3.2, D.4.2, D.6.2 and D.7.2 to insure that PM and PM_{10} emissions are less than the major PSD source levels of one hundred (100) tons per year.

D.2.2 Particulate Matter [326 IAC 2-2]

The particulate matter and PM_{10} emissions from the pouring and cooling operation shall not exceed 4.2 pounds per ton of metal poured and cooled, equivalent to 21.0 tons of PM and PM_{10} per year at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

D.3.2 Particulate Matter [326 IAC 2-2]

(a) The particulate matter emissions from the shakeout operation shall not exceed 3.20 pounds per ton of metal shakeout, equivalent to 16.0 tons of PM per year at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

(b) The PM_{10} emissions from the shakeout operation shall not exceed 2.24 pounds per ton of metal shakeout, equivalent to 11.2 tons of PM_{10} per year at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

D.4.2 Particulate Matter [326 IAC 2-2]

(a) The particulate matter emissions from the grinding and finishing operation shall not exceed 17.0 pounds per ton of metal ground and finished before control, equivalent to 2.55 tons of PM per year after control at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

(b) The PM_{10} emissions from the grinding and finishing operation shall not exceed 1.70 pounds per ton of ground and finished before control, equivalent to 0.255 tons of PM_{10} per year after control at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

D.6.2 Particulate Matter [326 IAC 2-2]

The particulate matter and PM_{10} emissions from the core making operation shall not exceed 1.10 pounds per ton of metal produced, equivalent to 5.50 tons of PM and PM_{10} per year at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

D.7.2 Particulate Matter [326 IAC 2-2]

The particulate matter and PM_{10} emissions from the scrap and charge handling operation shall not exceed 0.60 pounds per ton of metal charged, equivalent to 3.0 tons of PM and PM_{10} per year at the production limit of 10,000 tons of metal melted per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2.

In addition, the Quarterly Report Form for the production limit has been added as shown on the next page.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Akron Foundry, Inc..
Source Address: 502 Main Street Akron, Indiana 46910
Mailing Address: 502 Main Street Akron, Indiana 46910
Part 70 Permit No.: T 049-5899-00001
Facility: Two (2) Induction Furnaces
Parameter: Total metal melted
Limit: 10,000 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Comment 4:

Page 36 of 46, D.4.5 parametric monitoring—You suggest a static range of 3 - 5 inches, our normal range is 2 - 7 inches. I've had an engineer evaluate this and confirm that 3 - 5 inches is not realistic.

Response 4:

The permit application cited a pressure drop of "4.1" inches of water on Form CE-01 for this baghouse. The 3 to 5 inches of water that was written into the proposed permit was a range that surrounded the value in the application. In light of your updated information, Condition D.4.5 (now Condition D.4.6) has been revised to indicate a pressure drop of **2 to 7** inches.

Comment 5:

You are requiring Preventative Maintenance Plans and Compliance Response Plans for the 7 areas you have designated as emission units, page 1 of 16 TSD. Since we eliminated one of the two emission unit stacks (cupola furnace removed), there is only one stack for "emission units," (d and e) to observe which has the static pressure gauge attached. As for the other "emission units" (a, b, c, f and g), I'm not sure what I would observe, where I would observe and what I would plan to prevent or comply with, since I have never seen any emissions from these areas since 1964.

Response 5:

The preventive maintenance plans and compliance monitoring requirements have been deleted from Sections D.1, D.2, D.3, D.6 and D.7 because there are no PM controls on these operations and the actual PM emissions do not exceed 25 tons per year. Therefore, Sections D.1.2, D.1.4, D.1.5, D.2.2, D.2.4, D.2.5, D.3.2, D.3.4, D.3.5, D.6.2, D.6.4, D.6.5, D.7.2, D.7.4 and D.7.5 have been deleted from the permit and all Sections have been renumbered.

General Comments

It was only recently that I learned my comment/review period was just 30 days. I apologize for the delay, what with the holidays right in the middle of this period and the fact that I am still swamped with all the responsibilities of the process change we started up in October. I have to be honest, it is very disappointing to go through the expensive changes we made this past year in order to drastically reduce and eliminate pollution and then receive this Book of required paper work. I have put my house on the line as well as the jobs of 55 employees to improve the environment what are you risking: We just eliminated the processes with the most pollution in our shop and then receive this draft that requires more continual paper work. This is ridiculous! Whatever happened to the reduction in paper work act? Whatever happened to common sense?

One of my customers has moved to Mexico, another is beginning to buy from Canada. Any guesses as to why? I've had to cut some prices when I should be raising them to offset the increased cost of my product due primarily to more environmentally friendly processes. I am very frustrated and angry.

I have spent a small fortune on consulting fees this past couple of years in trying to respond properly to all that you continue to require. My expertise is and should be in making castings. However, I have always tried to respond promptly to your requests.

We have made major reductions in air and water pollution as well as eliminated a waste stream during the past year. All this is on record with the various state agencies. We have always been more than cooperative. I only ask for common sense to be applied here and we will continue to put forth our best efforts.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Akron Foundry, Inc.**
Source Location:	**501 Main Street, Akron, Indiana 46910**
County:	**Fulton**
SIC Code:	**3370**
Operation Permit No.:	**T 049 - 5899 - 00001**
Permit Reviewer:	**Frank P. Castelli**

The Office of Air Management (OAM) has reviewed a Part 70 Permit application from Akron Foundry, Inc. relating to the operation of a grey iron foundry.

The cupola that had been operating at this source has been replaced by two (2) electric induction furnaces. The induction furnaces were registered under CP 049-7103 issued on December 2, 1996. The induction furnaces were installed during July 1997 and began operations during October 1997. The cupola and wet scrubber have been dismantled and can no longer be operated and therefore are not included in this proposed operating permit.

This source is and has been treated as an existing major source under PSD rules. The production limit contained in Operation Permit No. 25-02-92-0069 issued on May 4, 1988 is no longer applicable since the cupola and scrubber have been dismantled.

The applicant has stated that the existing electrical connections to the two (2) induction furnaces prohibit the furnaces from operating simultaneously. However, since the electrical connections could be altered in the future so that both furnaces could operate simultaneously, the proposed permit assesses the combined capacity of the two (2) furnaces which allows flexibility for increased production in the future.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Two (2) electric induction furnaces, capacity: 6.0 tons of iron per hour, total.

(b) One (1) pouring and cooling operation, capacity: 6.0 tons of iron per hour.

(c) One (1) shakeout operation, capacity: 6.0 tons of iron per hour.

(d) One (1) grinding and finishing operation consisting of four (4) stationary grinders, one (1) shot-blaster and one (1) shared baghouse for particulate matter control, exhausting through stack S-2, capacity: 2.5 tons of iron per hour, total.

(e) One (1) sand handling operation consisting of one (1) muller, one (1) screenerator, one (1) bucket elevator, one (1) bucket loader, wet sand conveyors, one (1) sand and clay addition system, and one (1) shared baghouse for particulate matter control, exhausting through stack S-2, capacity: 48.9 tons of sand per hour, total.

(f) One (1) core making operation, capacity: 12.5 tons of sand per hour.

(g) One (1) scrap and charge handling operation, capacity: 6.0 tons of iron per hour.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour (torches).

(b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(c) The following VOC and HAP storage containers: Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(d) Refractory storage not requiring air pollution control equipment.

(e) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.

(h) Paved and unpaved roads and parking lots with public access.

(i) Purge double block and bleed valves.

(j) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38EC).

(k) Latex paint dip - protective coating for transport.

Existing Approvals

The source has been operating under the following approvals:

(a) OP 25-04-83-0051, issued on April 24, 1979.

(b) OP 25-02-92-0069, issued on May 4, 1988.

(c) OP 25-02-92-0072, issued on September 5, 1989.

(d) CP-049-4536, issued June 21, 1995.

(e) CP-049-7103, issued December 2, 1996.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 Permit application for the purposes of this review was received on May 20, 1996. Additional information was received on October 29, 1997.

A notice of administrative completeness was sent to the source on January 22, 1997.

Emission Calculations

See pages 1 through 5 of 5 of Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	**Potential Emissions** (tons/year)
PM	greater than 250
PM_{10}	greater than 250
SO_2	less than 100
VOC	less than 100
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Potential Emissions** (tons/year)
Lead	less than 10
Nickel	less than 10
Chromium	less than 10
Manganese	less than 10
Phenol	less than 10
Toluene	less than 10
Xylene	less than 10

Ethyl benzene	less than 10
TOTAL	less than 25

The potential emissions (as defined in the Indiana Rule) of PM and PM_{10} are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects 1995 OAM emission data for the criteria pollutants and 1996 emission data for the HAPs.

Pollutant	**Actual Emissions** (tons/year)
PM	0.125
PM_{10}	0.113
SO_2	1.48
VOC	0.297
CO	239
NO_x	0.165
MEK	0.0008
MDI	0.663
Phenol	1.323
Phosphorus	0.043
Toluene	0.0007

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Induction melting furnaces	23.7	22.6	0.00	0.00	0.00	0.00	1.51
Pouring and cooling operation	110	110	0.00	0.00	0.00	0.00	0.308
Shakeout operation	84.1	58.9	0.00	0.00	0.00	0.00	0.00
Grinding and finishing operation	5.58 (59.6)	0.558 (59.6)	0.00	0.00	0.00	0.00	0.00
Sand handling operation	23.1 (194)	23.1 (194)	0.00	0.00	0.00	0.00	0.00

Core making operation	28.9	28.9	0.00	0.021	0.00	0.00	2.35
Scrap and charge handling	15.8	15.8	0.00	0.00	0.00	0.00	0.00
Insignificant activities	5.00	5.00	1.00	3.0	1.00	2.00	2.00
Total Emissions	297 (522)	265 (495)	1.00	3.02	1.00	2.00	6.17

(a) The values in the table are the potential emissions after controls.

(b) The values in parentheses represent the maximum allowable PM and corresponding PM_{10} emissions from the grinding and finishing as well as the sand handling facilities based upon the hourly allowable PM limitations of 326 IAC 6-3-2.

(c) See pages 1 through 5 of 5 of Appendix A for detailed calculations.

(d) Attached Tables 1 through 7 of 7 summarize the permit conditions and requirements

County Attainment Status

The source is located in Fulton County.

Pollutant	Status
TSP	Attainment
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Fulton County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70

Permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD)

This source is an existing major source under PSD because it is one of the twenty eight (28) listed sources and the potential PM emissions after control exceed 100 tons per year. The source has not undergone PSD review for any of the existing equipment. Any future modifications to this source will be subject to the PSD significant threshold levels.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM_{10} in Fulton County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) emissions from the foundry operations are subject to this rule and PM emissions shall be limited by the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

The PM limits for each operation are as follows:

Operation	Process Weight (tons per hour)	Allowable PM Emission Rate (pounds per hour)	Potential PM Emission Rate After Controls (pounds per hour)
Scrap & charge handling	6.0	13.6	3.60
Two (2) electric induction melting furnaces	6.0, total	5.50, total	5.40, total
Pouring & cooling	24.0	34.5	25.2
Shakeout	24.0	34.5	19.2
Grinding and finishing	2.50	7.58	1.28
Sand handling	48.9	44.4	5.28
Core making	12.5	22.3	6.60

The allowable PM emissions for the two (2) furnaces are pursuant to Registration CP 049-7103 issued December 2, 1996 which truncated the allowable PM emissions to less than 25 tons per year for registration status.

As shown in the above table all operations comply with the requirements of this rule. The grinding and finishing operations and the sand handling operations require the operation of the baghouse control device in order to comply with 326 IAC 6-3-2.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions

would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The scrap and charge handling, melting, pouring and cooling, shakeout and core making operations have applicable compliance monitoring conditions as specified below:
Daily visible emissions notations of the emissions from each operation shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

(b) The grinding and finishing and sand handling operations have applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the emissions from the baghouse exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(2) The Permittee shall record the total static pressure drop across the baghouse controlling the sand handling operations, at least once weekly when sand handling operations are occurring. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 to 5.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouse for controlling particulate emissions from the grinding and finishing facilities and the sand handling operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to the Clean Air Act.

See attached calculations on page 5 of 5 of Appendix A for detailed air toxic calculations.

Conclusion

The operation of this grey iron foundry shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 049-5899-00001.**

Table 1

Description of facility: Two (2) electric induction melting furnaces
Max Rating: 6.0 tons per hour, total
Construction Date: 1997
Control Device (if any): None
Stack/Vent ID:

Facility class: 040 **Description:** Electric Induction Melting Furnaces

EMISSION LIMITATIONS		
Numerical Emission Limit:	**PM: 5.50 pounds per hour, total**	
Regulation/Citation:	**326 IAC 6-3-2**	
Compliance Demonstration:		
PERFORMANCE TESTING	**N/A**	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	**Visible emissions**	
Monitoring Method:	**Visual**	
Monitoring Regulation/Citation:	**326 IAC 2-7-6(1) & 2-7-5(1)**	
Monitoring Frequency:	**Daily**	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	**Visible emissions**	
Recording Frequency:	**Daily**	
REPORTING REQUIREMENTS		
Information in Report:	**Summary of deviations**	
Reporting Frequency/Submittal:	**As necessary within 10 days of discovery of deviation**	
Additional Comments:		

Table 2

Description of facility: Pouring and cooling operation
Max Rating: 6.0 tons per hour total
Construction Date: Unknown
Control Device (if any): None
Stack/Vent ID:

Facility class: 031 **Description:** Pouring and cooling

EMISSION LIMITATIONS		
Numerical Emission Limit:	PM: 34.5 pounds per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:		
PERFORMANCE TESTING	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	Visible emissions	
Monitoring Method:	Visual	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	Daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Visible emissions	
Recording Frequency:	Daily	
REPORTING REQUIREMENTS		
Information in Report:	Summary of deviations	
Reporting Frequency/Submittal:	As necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 3

Description of facility: Shakeout operation
Max Rating: 6.0 tons per hour
Construction Date: 1986
Control Device (if any): None
Stack/Vent ID: S-2

Facility class: 031 **Description:** Shakeout

EMISSION LIMITATIONS		
Numerical Emission Limit:	PM: 34.5 pounds per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:		
PERFORMANCE TESTING	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	Visible emissions	
Monitoring Method:	Visual	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	Daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Visible emissions	
Recording Frequency:	Daily	
REPORTING REQUIREMENTS		
Information in Report:	Summary of deviations	
Reporting Frequency/Submittal:	As necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 4

Description of facility: Grinding and finishing operation
Max Rating: 2.50 tons per hour total
Construction Date: 1965, 1970 and 1983
Control Device (if any): Baghouse
Stack/Vent ID: S-2

Facility class: 042 **Description:** Grinding and finishing

EMISSION LIMITATIONS		
Numerical Emission Limit:	PM: 7.58 pounds per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:		
PERFORMANCE TESTING	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	Visible emissions, pressure drops	
Monitoring Method:	Visual, gauge	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	Daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Visible emissions, pressure drop	
Recording Frequency:	Daily	
REPORTING REQUIREMENTS		
Information in Report:	Summary of deviations	
Reporting Frequency/Submittal:	As necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 5

Description of facility: Sand handling operation
Max Rating: 48.9 tons per hour total
Construction Date: 1965 and 1995
Control Device (if any): Baghouse
Stack/Vent ID: S-2

Facility class: 031 **Description:** Sand handling

EMISSION LIMITATIONS		
Numerical Emission Limit:	PM: 44.4 pounds per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:		
PERFORMANCE TESTING	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	Visible emissions, pressure drops	
Monitoring Method:	Visual, gauges	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	Daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Visible emissions, pressure drop	
Recording Frequency:	Daily	
REPORTING REQUIREMENTS		
Information in Report:	Summary of deviations	
Reporting Frequency/Submittal:	As necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 6

Description of facility: Core making
Max Rating: 6.0 tons per hour total
Construction Date: 1986
Control Device (if any): None
Stack/Vent ID:

Facility class: 031 **Description:** Core making

EMISSION LIMITATIONS		
Numerical Emission Limit:	PM: 22.3 pounds per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:		
PERFORMANCE TESTING	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	Visible emissions	
Monitoring Method:	Visual	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	Daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Visible emissions	
Recording Frequency:	Daily	
REPORTING REQUIREMENTS		
Information in Report:	Summary of deviations	
Reporting Frequency/Submittal:	As necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 7

Description of facility: Scrap and charge handling operation
Max Rating: 6.0 tons per hour total
Construction Date: 1986
Control Device (if any): None
Stack/Vent ID:

Facility class: 099 **Description:** Scrap and charge handling

EMISSION LIMITATIONS		
Numerical Emission Limit:	PM: 13.6 pounds per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:		
PERFORMANCE TESTING	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	Visible emissions	
Monitoring Method:	Visual	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	Daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Visible emissions	
Recording Frequency:	Daily	
REPORTING REQUIREMENTS		
Information in Report:	Summary of deviations	
Reporting Frequency/Submittal:	As necessary within 10 days of discovery of deviation	
Additional Comments:		

Appendix A: Emission Calculations
Grey Iron Foundry

Company Name: Akron Foundry, Inc.
Address City IN Zip: 502 Main Street, Akron, IN 46910
Part 70: T 049-5899
Plt ID: 049-00001
Reviewer: Frank P. Castelli
Date: May 20, 1996

Revised 3/16/99
Full melt rate on hourly basis and 10,000 ton per year melt limit.

Iron Process	Throughput tons/hr	Limited Production 10000 tons/yr	PM Control	
Scrap & Charge Handling	6.0		PM Control	0.0%

SCC 3-04-003-15

AP-42 Table 12.10-7	PM	PM10	Allowable PM 326 IAC 6-3-2
Emission Factors lbs/ton produced	0.6	0.6	
Percentage of Emissions	100.00%	100.00%	
Potential Emissions lbs/hr	3.600	3.600	13.6
Potential Emissions lbs/day	86.40	86.40	
Potential Emissions tons/yr	15.8	15.8	
Potential Emissions after Controls tons/yr Limited Production	3.00	3.00	

Iron Process	Throughput tons/hr		PM Control	0.0%
2 Electric Induction Furnaces	6.0	**Limited Production 10000 tons/yr**		

SCC 3-04-003-03

AP-42 Table 12.10-3	PM	PM10	Allowable PM 326 IAC 6-3-2
Emission Factors lbs/ton produced	0.9	0.86	
Percentage of Emissions	100.00%	100.00%	
Potential Emissions lbs/hr	5.40	5.16	13.6
Potential Emissions tons/yr	23.7	22.6	
Potential Emissions after Controls tons/yr Limited Production	4.50	4.30	

Iron Process	Throughput tons/hr		PM Control	0.0%
Pouring & Cooling	6.0		**Limited Production**	
SCC 3-04-003-18			**10000**	**tons/yr**
AP-42 Table 12.10-7	PM	PM10	Allowable PM	
Emission Factors lbs/ton produced	4.2	4.2	326 IAC 6-3-2*	
Percentage of Emissions	100.00%	100.00%		
Potential Emissions lbs/hr	25.20	25.20	27.0	
Potential Emissions tons/yr	110.4	110.4		
Potential Emissions after Controls tons/yr	21.00	21.00		
Limited Production				

*326 IAC 6-3-2 based process weight of 16.66 tons/hr sand mold + metal
See page 6 of 6 for VOC emissions from binder

Iron Process	Throughput tons/hr		PM Control	0.0%
Shakeout	6.0		**Limited Production**	
SCC-3-04-003-31			**10000**	**tons/yr**
AP-42 Table 12.10-7	PM	PM10	Allowable PM	
Emission Factors lbs/ton produced	3.2	2.24	326 IAC 6-3-2*	
Percentage of Emissions	100.00%	100.00%		
Potential Emissions lbs/hr	19.20	13.44	27.0	
Potential Emissions tons/yr	84.10	58.87		
Potential Emissions after Controls tons/yr	16.00	11.20		
Limited Production				

*326 IAC 6-3-2 based process weight of 16.66 tons/hr sand mold + metal

Iron Process	Throughput tons/hr		PM Control	97.0%
Grinding & Finishing	6.0		**Limited Production**	
SCC 3-04-003-40			**10000**	**tons/yr**
AP-42 Table 12.10-7	PM	PM10	Allowable PM	
Emission Factors lbs/ton produced	17	1.7	326 IAC 6-3-2	
Percentage of Emissions	100.00%	100.00%		
Potential Emissions lbs/hr	102.0	10.20	13.62	
Potential Emissions tons/yr	447	44.7		
Potential Emissions after Controls tons/yr	2.55	0.255		
Limited Production				

Iron Process		Throughput tons/hr		PM Control	
Sand Handling		21.00			97.0%
SCC 3-04-003-50					
AP-42 Table 12.10-7	PM	PM10	Allowable PM		
Emission Factors lbs/ton sand handled	3.6	3.6	326 IAC 6-3-2		
Percentage of Emissions	100.00%	100.00%			
Potential Emissions lbs/hr	76	76	31.5		
Potential Emissions tons/yr	331	331			
Potential Emissions after Controls tons/yr	9.93	9.93			

Iron Process		Throughput tons/hr		PM Control	
Core Making		6.0	**Limited Production**		
SCC 3-04-003-19			**10000**	**tons/yr**	
AP-42 Table 12.10-7	PM	PM10	VOC	Allowable PM	
Emission Factors lbs/ton produced (metal)	1.1	1.1	0.0008	326 IAC 6-3-2*	
Percentage of Emissions	100.00%	100.00%	100.00%		
Potential Emissions lbs/hr	6.60	6.60	0.005	13.69	
Potential Emissions tons/yr	28.91	28.91	0.021		
Potential Emissions after Controls tons/yr Limited Production	5.50	5.50	0.004		

*326 IAC 6-3-2 based on process weight of 6.05 tons/hr sand molds and metal

SUMMARY OF POTENTIAL EMISSIONS
Before and After Controls and Production Limit of 10,000 tonsof metal melted per year

Process Description	Before/After Control	PM (tpy)	PM10 (tpy)	VOC (tpy)
Iron Scrap & Charge Handling	Before	15.8	15.8	0.00
	After	3.00	3.00	0.00
Iron 2 Electric Induction Furnaces	Before	23.7	22.6	0.00
	After	4.50	4.30	0.00
Iron Pouring & Cooling	Before	110.4	110.4	5.02
	After	21.0	21.0	5.02
Iron Shakeout	Before	84.1	58.9	0.00
	After	16.0	11.2	0.00
Iron Grinding & Finishing	Before	447	44.7	0.00
	After	2.55	0.255	0.00
Iron Sand Handling	Before	331	331	0.00
	After	9.93	9.93	0.00
Iron Core Making	Before	28.9	28.9	0.021
	After	5.50	5.50	0.004
TOTALS	**Before:**	**1041**	**612**	**5.04**
	After:	**62.5**	**55.2**	**5.02**

See page 6 of 6 for VOC emissions from binder

HAP Emission Calculations
Grey Iron Foundry

Company Name: **Akron Foundry, Inc.**
Address City IN Zip: **502 Main Street, Akron, IN 46910**
Part 70: **T049-5899**
Plt ID: **T049-00001**
Reviewer: **Frank P. Castelli**
Date: **May 20, 1996**

HAPs From Iron Melting		HAP Emission Factor (lbs/ton)	Metal Throughput (tons/hr)	Control Eff (%)	Potential HAP Before Controls (tons/yr)	Potential HAP After Controls (tons/yr)
Lead		0.0455	6.00	0.00%	1.20	1.20
Nickel		0.0009	6.00	0.00%	0.024	0.024
Chromium		0.0045	6.00	0.00%	0.118	0.118
Manganese		0.0063	6.00	0.00%	0.166	0.166

HAPs From Iron Pouring & Cooling	Heavy Metals Only, see page 6 of 6 for VOCs and HAPS from binder					
Nickel		0.0009	6.00	0.00%	0.024	0.024
Chromium		0.0045	6.00	0.00%	0.118	0.118
Manganese		0.0063	6.00	0.00%	0.166	0.166

Summary of HAPs		Potential HAP Before Controls (tons/yr)	Potential HAP After Controls (tons/yr)
Lead		1.20	1.20
Nickel		0.047	0.047
Chromium		0.237	0.237
Manganese		0.331	0.331
	Total	**1.81**	**1.81**

HAP Emission Calculations
Pouring-Cooling-Shakeout Binder Systems
for Grey Iron Foundries

Company Name: **Akron Foundry, Inc.**
Plant Location: **502 Main Street, Akron, IN 46910**
Part 70: **T 049-5899**
Plt Id: **T 049-00001**
Permit Reviewer: **Frank P. Castelli**
Date: **May 20, 1996**

Seacoal Annual Usage of Index Material (lbs/yr)	Binder System
840960	Green Sand

	Binder System Type Emission Factors => Lbs. of Chemical Released to Air per Lbs. of Index											
Pollutant	Phenolic Nobake (Resin)	Phenolic Urethane (Resin)	Phenilic Hotbox (Resin)	Green Sand (Seacoal)	Core Oil (Core Oil)	Shell (Resin)	Low Nitrogen Furan (Resin)	Med Nitrogen Furan TSA Catalyst (Resin)	Furan Hotbox (Resin)	Alkyd Isocyanate (Resin & Isocyanate)	Sodium Sili-cate & Ester (Sugar & Ester)	Pollutant Emissions (lbs/yr)
Ammonia	0.000039	0.000083	0.010931	0.000065	0.000038	0.003860	0.000040	0.000202	0.019579	0.000037	0.000038	54.662
Hydrogen Sulfide	0.001462	0.000057	0.000009	0.000832	0.000057	0.000094	0.000405	0.000486	0.000060	0.000007	0.000197	699.679
Nitrogen Oxides	0.000029	0.000044	0.000638	0.000562	0.000081	0.000994	0.000012	0.000312	0.000411	0.000355	0.000028	472.620
Sulfer Dioxide	0.015107	0.000061	0.000036	0.000253	0.000115	0.003509	0.000607	0.004858	0.000088	0.000040	0.000244	212.763
Total Hydrocarbons	0.012159	0.023377	0.005165	0.011941	0.028737	0.022421	0.007814	0.017178	0.006259	0.035567	0.022782	10041.903
Acrolein	0.000005	0.000031	0.000009	0.000002	0.000077	0.000047	0.000028	0.000016	0.000013	0.000088	0.000028	1.682
Benzene	0.011209	0.005351	0.001002	0.000611	0.002344	0.006667	0.000648	0.004534	0.000537	0.005336	0.001410	513.827
Formaldehyde	0.000010	0.000022	0.000006	0.000004	0.000096	0.000035	0.000267	0.000065	0.000009	0.000106	0.000169	3.364
Hydrogen Cyanide	0.000029	0.001053	0.001184	0.000118	0.000086	0.010526	0.000368	0.000607	0.003474	0.000175	0.000179	99.233
M-Xylene	0.000097	0.000439	0.000121	0.000021	0.000239	0.000585	0.002227	0.000243	0.000032	0.002522	0.000094	17.660
Napthalene	0.000049	0.000022	0.000030	0.000021	0.000048	0.000058	0.000040	0.000040	0.000032	0.000037	0.000005	17.660
O-Xylene	0.000049	0.000132	0.000030	0.000021	0.000287	0.000117	0.000729	0.000040	0.000032	0.003838	0.000094	17.660
Phenol	0.000975	0.003904	0.000203	0.000131	0.000057	0.002456	0.000024	0.000101	0.000016	0.000110	0.000273	110.166
Toluene	0.000634	0.000833	0.000182	0.000063	0.000478	0.002807	0.000210	0.008826	0.000032	0.001535	0.000282	52.980
Total Aromatic Amines	0.000049	0.000351	0.001275	0.000021	0.000096	0.002339	0.000081	0.000364	0.003032	0.000037	0.000094	17.660
Total C2 to C5 Aldehydes	0.003070	0.000219	0.000273	0.000063	0.000766	0.000585	0.000243	0.017004	0.000158	0.002156	0.001316	52.980
Total HAPs	0.016174	0.012355	0.004318	0.001076	0.004574	0.026222	0.004777	0.031842	0.007364	0.015939	0.003943	904.873

Total State Potential Emissions

METHODOLOGY

HAPS emission rate (tons/yr) = Annual Usage (lbs/yr) * Emission Factor (lbs Chemical/lbs Index) * 1 ton/2000 lbs